

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

KEYBANK NATIONAL ASSOC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 14-cv-1368-DCN
)	
JASON COPE, et al,)	
)	
Defendants.)	

ANSWER

The United States Securities and Exchange Commission (“SEC”), by and through its attorney Michael J. Roessner, Assistant Chief Litigation Counsel, hereby submits its Answer to Plaintiff’s Complaint as follows:

1. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 1.
2. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 2.
3. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 3.
4. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 4.
5. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 5.

6. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 6.

7. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 7.

8. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 8.

9. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 9.

10. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 10.

11. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 11.

12. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 12.

13. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 13.

14. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 14.

15. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 15.

16. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 16.

17. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 17.

18. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 18.

WHEREFORE, the United States Securities and Exchange Commission respectfully requests that this Court:

1. Determine and adjudge that the United States Securities and Exchange Commission's Abstract of Judgment, recorded as Instrument No. 201205219002, and its Judgment Lien filed in Civil Case No. JL-12-479456, both recorded on May 21, 2012, in the Records of Cuyahoga County, State of Ohio, created valid and subsisting judgment liens on all property and rights to property belonging to Jason Cope including on the subject property located at 7449 Brigham Road Gates Mills, OH 44040;
2. Order that all valid liens upon the subject property be enforced, and that the Court order the foreclosure and sale of the subject property, and distribute the proceeds of the sale to such parties and in such amounts as the Court determines; and
3. Award the United States Securities and Exchange Commission its further costs and such other and further relief as the Court deems just and proper.

Dated: June 25, 2014

Respectfully submitted,

s/MICHAEL J. ROESSNER
MICHAEL J. ROESSNER
Assistant Chief Litigation Counsel
Division of Enforcement
United States Securities and Exchange Commission
100 F Street, NE
Mail Stop 5985
Washington, DC 20549-0022
RoessnerM@SEC.gov
Telephone: 202.551.4347
Facsimile: 703.813.9366

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that on June 25, 2014, a copy of the foregoing Answer was mailed by regular U.S. mail, postage prepaid to the following defendants at the following addresses:

CITIMORTGAGE, Inc.
1000 Technology Place
O'Fallon, MO 63368

Woods Cove II, LLC
1801 West Olympic Blvd.
Pasadena, CA 91199

Payne and Payne Custom Builders
10750 Mayfield Road
Chardon, Ohio 44024

State of Ohio Department of Taxation
c/o Ohio Attorney General Mike DeWine
30 E. Broad Street, 14th Floor
Columbis, Ohio 43215

United States of America
Internal Revenue Service
c/o United States Department of Justice
950 Pennsylvania Avenue
Washington, DC 20530-0001

STEVEN M. DETTELBACH
United States Attorney
400 United States Court House
801 W. Superior Avenue
Cleveland, OH 44113-1852

Cuyahoga County Fiscal Officer
Whitlatch Building
1910 Carnegie Avenue
Cleveland, Ohio 44115

David A. Freeburg
6690 Beta Drive, Suite 320
Mayfield Village, OH 44143
Counsel for Plaintiff Keybank National Association
freeburg@mcfaddenlaw.us

Alan S. Fellheimer
2 Liberty Place
50 South 16th Street
34th Floor
Philadelphia, PA 19102
Counsel for Jason Cope, Staci Cope, and Suprafin, Ltd.
Alan@fellheimer.net

s/MICHAEL J. ROESSNER
Michael J. Roessner